

ATTACHMENT III-2

WASTE IDENTIFICATION AND TRACKING PLAN

1. PURPOSE, APPLICABILITY, AND SCOPE

This plan shall track the current location of wastes being managed at the Facility. This plan shall identify the location of waste associated with that waste. This plan shall also track waste from receipt into permitted management, through applicable treatment, completion of disposal, and to closure of a Mixed Waste Landfill Cell Sump.

This plan allows for the tracking of containers as a group or as individual containers. The requirements of this plan shall be met while tracking containers using unique container numbers or tracking codes. The intent of this plan is not to provide a historical log of all movements of waste.

2. GENERAL REQUIREMENTS

a. Daily Tracking Documents.

- i. When operations involve changes of location or management status of waste in accordance with this plan, such transfers or change in management status, shall be recorded on the Daily Tracking Documents.
- ii. Daily Tracking Documents shall be maintained current to the end of the previous business day.
- iii. Transfers and movements of waste during an operating day (calendar date) that result in no change in location or management status shall not require documentation.

b. Facility Tracking Record.

- i. On a weekly basis, information from the Daily Tracking Documents shall be used to update the Facility Tracking Record. By the end of each calendar week, the Facility Tracking Record shall be updated at least to the end of the previous calendar week.
- ii. The Permittee may conduct verifications of information on the Facility Tracking Record. As a result of these verifications, a summary of corrections shall be made and the Facility Tracking Record shall be corrected.

- c. Disposition of Tracking Records.
 - i. Daily Tracking Documents shall be kept on file for a period of three years.
 - ii. Summaries of corrections made to the Facility Tracking Record shall be kept on file for a period of three years.
 - iii. For each sump closed within the Mixed Waste Landfill Cell, a copy of the associated portion of the Facility Tracking Record shall be submitted to the Executive Secretary.

3. TRACKING REQUIREMENTS

- a. Tracking information in this Section shall be kept as part of the Operating Record. Such recordkeeping shall provide a cross-reference showing when waste from identified shipments are taken to treatment, placed in storage, or disposed.
- b. Manifest Tracking Information. For wastes received from off-site, a tracking number shall be written on each hazardous waste manifest. The tracking number shall be a three-part number, e.g., 0123-45-X67890, and include:
 - i. Generator Number assigned by the Permittee,
 - ii. Waste Stream Number assigned by the Permittee, and
 - iii. Bates Number or shipment number assigned by the Permittee.
(Note: Bates Number refers to a unique number that the Permittee assigns to wastes shipments.)
- c. Filing and Indexing Documents. The following documents associated with incoming waste shall be filed or indexed in the Operating Record by Generator Number and Waste Stream Number or by Bates Number (or shipment number):
 - i. Radioactive Waste Shipment and Disposal Record (RSR),
 - ii. Hazardous Waste Manifest,
 - iii. Waste Profile Record,
 - iv. Incoming-Shipment Inspection Record, and
 - v. Incoming-Shipment On-Site Fingerprint/Acceptance Summary.
- d. Container Information. Containers in storage shall be marked or labeled with the following information:
 - i. Generator Number,

- ii. Waste Stream Number,
- iii. Bates Number, Shipment Number, or Treatment Run Number, and
- iv. “Hazardous Waste”

(Note: A treatment run shall be defined as all waste that is treated during one calendar day of operation. A Treatment Run Number shall be a number used to identify a treatment run at the Mixed Waste Treatment Facility.)

- e. Non-Treatment Container Tracking Information. For wastes received from off-site that do not require treatment and that are managed in permitted storage and disposal areas, the following information shall be kept for each container.

- i. Generator Number,
- ii. Waste Stream Number,
- iii. Bates Number or Shipment Number,
- iv. Manifest Number,
- v. Waste Form (Solid, Soil, Sludge, Debris, Other),
- vi. Current Type of Container,
- vii. Volume or Weight of Container and units (lbs., tons, gallons, ft³, yd³),

(Note: When a container volume is used, the volume shall be the nominal container volume. When weights are used, weights shall be estimated, averaged, or weighed, including the waste and/or the container.)

- viii. Date Waste Accepted Into Permitted Management (Storage), and
- ix. Current Location of Waste (storage area, holding area, cell area, placement reference).

- f. Tracking of Repackaged Waste

- i. If waste is overpacked or repackaged, updated information for items 3.e.iii-vii or 3.i.iii.-vi shall be obtained, and the Facility Tracking Record shall be updated accordingly.
- ii. Where such repackaging involves waste from more than one shipment, notes shall be provided as part of the Facility Tracking Record for the applicable shipment information.

- g. Non-Treatment Disposal Tracking

- i. In addition to the requirements in 3.e, above, the following information shall be added to the Facility Tracking Record when waste is transferred from storage to disposal management without treatment:

- A. Date Waste Transferred to the Mixed Waste Landfill Cell.

- ii. When final placement and disposal management is completed, a reference to the placement location documentation shall be provided.
- h. Transfers to Treatment. When waste is transferred to treatment, the following procedures shall be followed:
 - i. The Facility Tracking Record shall be changed to reflect management in treatment.
 - ii. The following information shall be added to the Facility Tracking Record:
 - A. Date Waste Transferred to Treatment, and
 - B. Treatment method, e.g., stabilization, solidification, etc.
 - iii. If waste that has been transferred to treatment is transferred back to storage without being **treated**, then the treatment area shall be considered a storage area. Therefore, the tracking information, items 3.e.i through 3.e.ix shall be replaced into the storage record, and the added information in 3.h.ii shall be removed.
 - iv. If a portion of the waste has been removed or repackaged while in treatment and placed back into storage, the requirements of 3.f, above shall be followed.
- i. Tracking Following Treatment. For wastes that have been treated and are transferred from treatment management to management in storage, the following information shall be kept for each container:
 - i. Generator Number,
 - ii. Waste Stream Number,
 - iii. Treatment Run Number,
 - iv. Waste Form (Solid, Soil, Sludge, Debris, Other),
 - v. Current Type of Container,
 - vi. Volume or Weight and units, (Note: When a container volume is used, the volume shall be the nominal container volume. When weights are used, weights shall be estimated, averaged, or weighed, including the waste and/or the container.
 - vii. Other Treatment Runs (any prior unsuccessful runs) and Run Numbers, if applicable, and
 - viii. Current Location of Waste (storage area, holding area, cell area, placement reference).

- j. Tracking Following Macroencapsulation or Microencapsulation. Tracking for wastes that are being macroencapsulated or microencapsulated shall be accomplished by tracking containers or groups of containers with the same Run Number in accordance with the following requirements:
 - i. Containers from which waste is being removed for macroencapsulation or microencapsulation shall be tracked as outlined in 3.e, above.
 - ii. Containers, which are used as molds shall not require tracking if the container is emptied by the end of the work day.
 - iii. Containers into which macroencapsulated or microencapsulated waste is transferred following macroencapsulation or microencapsulation shall be tracked as outlined in 3.i, above.
 - iv. MACRO Forms shall be tracked as outlined in 3.i, above.
 - v. MACRO Capsules shall be tracked as outlined in 3.i, above.

(Note: Nominal volumes of containers involved in such processes may be used as outlined in 3.e or 3.i, to eliminated the complications of tracking the weights of wastes that are being transferred from container to container.)

 - vi. For each Bates Number or Shipment Number of wastes that are being macroencapsulated or microencapsulated, the date treatment began shall be recorded.
 - A. Date Macroencapsulation or Microencapsulation began.
 - vii. Where containers are used to store MACRO-process or microencapsulation-process waste with more than one Run Number, notes shall be provided as part of the Facility Tracking Record for the applicable information.
- k. Disposal Tracking Following Treatment. In addition to the requirements in 3.i or 3.j, above, the following information shall be added when waste transfer from storage to disposal management following treatment occurs:
 - i. When final placement and disposal management is completed, the location within the Mixed Waste Landfill Cell shall be documented in the Facility Tracking Record.
- l. Tracking Involving Transfers form the Mixed Waste Landfill Cell.

- i. When wastes are removed from the Mixed Waste Landfill Cell, e.g., following MACRO and MICRO waste form inspections, the following information shall be kept in the Operating Record. Other subsequent and applicable information shall also be recorded in accordance with management of the waste and the requirements of this plan:
 - A. Generator Number;
 - B. Waste Stream Number;
 - C. Bates Number or Run Number;
 - D. Waste Form (MICRO Form, MACRO Form, MACRO Capsule);
 - E. Current Type of Container;
 - F. Volume or Weight in units; (Note: When a container volume is used, the volume shall be the nominal container volume. When weights are used, weights shall be estimated, averaged, or weighed, including the waste and/or the container.)
 - G. Current Location of Waste (storage area, cell area, placement reference), and
 - H. Reason for removal from the Mixed Waste Landfill Cell.

- ii. When wastes not included in Section 3.1.i of this Plan, are removed from the Mixed Waste Landfill Cell, the following information shall be kept in the Operating Record. Other subsequent and applicable information shall also be recorded in accordance with the management of the waste and the requirements of this plan.
 - A. Generator Number;
 - B. Waste Stream Number;
 - C. Cell Removal Number (a unique number assigned to waste at the time of removal from the cell);
 - D. Waste Form (solids, soils, sludge, debris, etc.);
 - E. Current Type of Container;
 - F. Volume or Weight in units; (Note: When a container volume is used, the volume shall be the nominal container volume. When weights are used, weights shall be estimated, averaged, or weighed, including the waste and/or the container.);
 - G. Current Location of Waste (storage area, cell location);
 - H. Reason for removal from the Mixed Waste Landfill Cell.